

The Law Offices of Avrum J. Rosen

A Professional Limited Liability Company

Attorneys at Law
38 New Street
Huntington, New York 11743
631 423 8527
arosen@ajrlawny.com

AVRUM J. ROSEN
NICO G. PIZZO
ALEX E. TSIONIS+
(+ also admitted in New Jersey)

DEBORAH L. DOBBIN
DANIEL LEBRUN

February 11, 2025

BY CM/ECF ONLY

Hon. Elizabeth S. Stong
U.S. Bankruptcy Court, EDNY
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East - Suite 1595
Brooklyn, NY 11201-1800

Re: Status Letter
Rachel One Holding Inc., 23-42184-ess

Dear Judge Stong:

This status letter is being provided to address Ms. Francis' correspondence filed on the afternoon of February 6, 2025. It is accurate that a revised plan was not filed by the January 31, 2025 deadline. What Ms. Francis neglected to disclose was that the undersigned had been unable to reach my client prior and subsequent to that date because Ms. Kashun was hospitalized for emergency surgery in late January for five (5) days, then released and then readmitted for another seven (7) days. She was not back home until this past Saturday and is still convalescing. Since then, all tax payments have been made, proof is attached, as has the adequate protection payment for January.

Also, during all this time, the undersigned has been working on the issues of getting an accurate water bill and abating the RPIE penalty, so that the revised plan would be accurate and confirmable. The client has sent the attached water bill that she just received which shows that *all* post-petition charges have been abated and the debtor now has a post-petition credit of over \$18,000.00 and he prepetition balance has been reduced to about \$120,000.00 from the approximate amount of over \$160,000.00 in the proof of claim. The undersigned is still working with Corporation counsel to further resolve that claim.

The undersigned also obtained the 2021 tax return for the Debtor, which showed no income and forwarded it to corporation counsel as this was requested to prove that the Debtor was not required to file the 2021 RPIE form. That is being reviewed by corporation counsel. If as expected, this resolves that issue, there will be a further reduction of the tax claim of approximately \$87,000.00.

On the other hand, the Debtor's principals were not able to get as much equity out of their home to fund the Plan, so the undersigned has modified the proposed settlement with Ms. Francis' client and sent a redline of the plan to her, Mr. LaMonica and the U.S. Trustee to review. As soon as there is agreement, it will be filed.

Thank you.

Very truly yours,

S/ Avrum J. Rosen

Avrum J. Rosen, Esq.

All parties via ECF